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Attorney for Defendant
JONATHAN SOUVANNASANE

UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

Plaintiff,

v.

JONATHAN SOUVANNASANE

Defendant.

Case: 1:15-cr-00167-JLT-SKO
1:23-cr-00042 JLT SKO

**STIPULATION REGARDING
EXCLUDABLE TIME PERIODS
UNDER SPEEDY TRIAL ACT;
ORDER**

DATE: October 2, 2023

TIME: 1:00pm

COURT: Hon. Jennifer L. Thurston

Plaintiff United States of America, by and through its counsel of record, and
defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. This matter is currently set for sentencing on October 2, 2023 in this Court.
2. By this stipulation, defendant now moves to continue the sentencing until **November 27, 2023**, and to exclude time between **October 2, 2023**, and **November 27, 2023**, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].
3. The parties agree and stipulate, and request that the Court find the

following:

- a) Counsel for defendant desires additional time to prepare for the sentencing due to currently being unavailable due to the ongoing trial in the Fresno Superior Court, Department 74 in the People v. Marc Anthony Roque.
- b) Counsel for defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
- c) The government does not object to the continuance.
- d) Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: September 27, 2023

PHILLIP A. TALBERT
United States Attorney
/S/ KIMBERLY SANCHEZ
KIMBERLY SANCHEZ
Assistant United States Attorney

Dated: September 27, 2023

/s/ YAN SHRAYBERMAN
YAN SHRAYBERMAN
Counsel for Defendant

FINDINGS AND ORDER

IT IS SO ORDERED.

Dated: September 28, 2023


UNITED STATES DISTRICT JUDGE